# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

DANIELA MORENO, Individually and	§	
on behalf of all others similarly situated	§	
	§	
Plaintiff,	§	
	§	
V.	§	
RAUL CANTU,	§	Civil Action No. 7:18-cv-00150
LORENA VILLANUEVA,	§	
FAYDALI CANTU, and	§	
OLEGARIO CANTU	§	
	§	
Defendants.	§	

## <u>JOINT MOTION</u> FOR APPROVAL OF SETTLEMENT AND DISMISSAL WITH PREJUDICE

The parties file this Joint Motion for Approval of Settlement and Dismissal with Prejudice, and respectfully state as follows:

This is an action for unpaid wages under the Fair Labor Standards Act of 1938, as amended ("FLSA"), 29 U.S.C. § 201 et seq. Plaintiff asserted she and other similarly-situated individuals were owed unpaid minimum wages and overtime based on their work for Defendants. Defendants deny Plaintiff's allegations. The parties engaged in arms-length settlement negotiations to resolve the bona fide disputes between them, and reached a settlement agreement as to putative class members and the named Plaintiff. This settlement agreement is memorialized in the Stipulation of Settlement and Release attached hereto as Exhibit 1. The parties agree that the settlement agreement reflects a fair and reasonable compromise of Plaintiff's and the putative class members' claims.

Wherefore, the parties respectfully request that the Court approve the settlement agreement and dismiss this case with prejudice.

## Respectfully submitted,

### /s/ Caitlin Boehne

CAITLIN BOEHNE

#### **ATTORNEY-IN-CHARGE**

Texas Bar No. 24075815 Southern District of Texas Federal ID No. 3146004

cboehne@equaljusticecenter.org

## ANNA BOCCHINI

Texas Bar No. 24057410 Southern District of Texas Federal ID No. 3145999 abocchini@equaljusticecenter.org

### **EQUAL JUSTICE CENTER**

510 S. Congress Ave., Suite 206

Austin, Texas 78704

Tel.: (512) 474-0007, ext. 110

Fax: (512) 474-0008

#### ATTORNEYS FOR PLAINTIFF

# /s/ Cesar O. Aguilar

### CESAR O. AGUILAR

Texas Bar No. 24079975 Southern District of Texas Federal ID No. 1872188 Coalaw956@yahoo.com 2112 S. Shary Road Suite 31 & 34 Mission, Texas 78572

Tel.: (956) 688-8822 Fax: (956) 284-0114

#### ATTORNEY FOR DEFENDANTS

# **CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2109, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Cesar O. Aguilar coalaw956@yahoo.com 2112 S. Shary Road Suite 31 & 34 Mission, Texas 78572

/s/ Caitlin Boehne
Caitlin Boehne